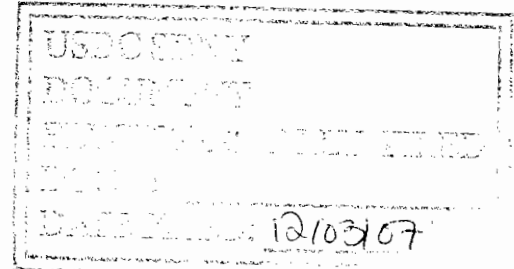


11/19/2007 16:02 2123495298
Dec 13/2007

GALVANO & XANTHAKIS

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RUSSELL D. COPELAND



STIPULATION TO AMEND
SECOND COMPLAINT
07 CIV 8044

Plaintiff,

-against-

THE VERTICAL ATMOSPHERE INC. and
TAYFUN HEKJUM,

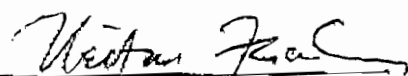
Defendants

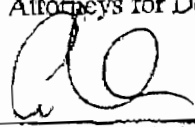
IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Plaintiff and Defendants, that Plaintiffs can Amend the Amended Complaint to add a claim under The New York State Labor Law § 215- Retaliatory Termination.

IT IS FURTHER STIPULATED AND AGREED that this stipulation may be signed in counterparts and fax shall be sufficient for all purposes.

FRANK & ASSOCIATES, P.C.
Attorneys for Plaintiff

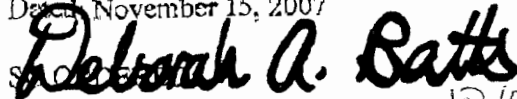
Galvano & Xanthakis, P.C.
Attorneys for Defendants


Neil M. Frank, Esq.
500 Bi-County Boulevard, 112N
Farmingdale, New York 11735
(631) 756-0400
Fax (631) 756-0547


Anthony A. Xanthakis, Esq.
150 Broadway, Suite 2100
New York, New York, 10038
(212) 349-5150
Fax (212) 349-5298

Dated: November 15, 2007

Dated: November 15, 2007



The Honorable Deborah A. Batts
United States District Judge

12/03/07